

CMSI Consultation Response

Respondent Details

NAME

Shane Borchardt

COUNTRY

Canada

PERMISSION

Yes, CMSI can disclose my feedback, name, and organisation.

STAKEHOLDER

Industry (upstream)

ORGANISATION

Cameco Corporation

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

6. What will the composition of the Board look like?

COMMENT:

The composition of the board is our most significant concern associated with the standard.

The most important stakeholder group for the new consolidated mining standard are mining companies that decide to implement the standard. However, this group is under-represented in both the board level (25% of members) and the committees (33% on mining committee and 0% on value chain committee). Under-representation of mining companies on the board is our primary concern for the consolidated standard and at some point is likely to result in requirements that can not be implemented for certain sub-sectors of mining industry.

The importance of having a greater proportion of the board and committee members from mining companies is reflected in the management model for currently successful sustainability standards created by the consolidated mining standard's founding organizations:

- *MAC's board of directors is entirely comprised of mining company representatives*
- *TSM governance is equally split between industry and stakeholder members*
- *CopperMark's board of directors is 50% industry representatives and 50% stakeholder groups*
- *World Gold Council's board of directors is entirely comprised of mining company representatives.*

The only other entity that has a governance structure like what is being proposed for the consolidated standard is IRMA, which has resulted in an unworkable standard. It is unclear why the consolidated standard is moving away from the governance model that has successfully worked for each of their respective sustainability standards and are instead moving toward a management model that mirrors other mining standards that have not been as widely adopted. The governance structure needs to have a much larger board of directors that is comprised of at least 50% mining company representatives (or national mining association representatives). Other global standard setting organizations, such as ISO and the International Commission

on Radiological Protection, are able to function with much larger board sizes than what is proposed for the Consolidated Mining Standard.

8. What will the composition of the Mining and Value Chain Committees look like?

COMMENT:

The mining committee should be comprised entirely of mining industry representatives. To ensure that all mining types are adequately represented, the committee should be comprised of any national level mining association and mining company representative that wants to participate. This model of a large and diverse working group has been effectively utilized in most other international standard setting organizations.

QUESTION 1

The governance principles that guided the development of the governance model are inclusive, effective, credible, impact-driven, pragmatic and efficient. From your perspective, does the proposed governance model meet expectations for consistency with these principles?

Response: **1: Significantly below**

The ability of the board to maintain the usability of the standard and ensure the standard requirements remain value added is a crucial component to the standard's success. Currently this was not identified as a need for the board and is not reflected in the ongoing board composition.

QUESTION 2

Does the proposed governance model ensure no single group is able to unduly influence decisions?

Response: **no**

The board composition is likely to produce modifications to the standard that are not practical for sub-sections of the mining industry.

Document:
Assurance

2. Roles and Responsibilities

COMMENT:

It is unclear why senior management needs to commit to and support the assurance process. If budget is available and sufficient, this should be seen as senior management commitment.

COMMENT:

Who will be responsible to pay for the assurance provider to participate in the assurance oversight process? This seems to come after the assurance process and therefore won't be part of the facility's contract.

COMMENT:

Under 4.2.7 planning - The National Panel Guidance should also inform the amount of effort in each performance area.

4. Consolidated Standard External Assurance Process

COMMENT:

4.5.1 - There is very little within the consolidated standard that is affected by a change in operations status. For example, entering into care and maintenance does not affect H&S or aboriginal consultations. There shouldn't be a requirement to communicate this to the secretariat.

5. Dispute Resolution Process

COMMENT:

The document mentions a sub-committee of the Board of Directors. However, there doesn't appear to be a "sub-committee" in the governance model. Is this supposed to be the mining committee? Perhaps the stakeholder committee?

QUESTION 1

From your perspective, does the Assurance process meet your expectations of a robust, credible, replicable and transparent approach?

Response: 3: Meets expectations

The assurance process appears to be robust and credible, although will be at a much greater expense than what MAC TSM external verification was completed for.

Document:
Standard

Introduction

SECTION: 6) Glossary and interpretive guidance

COMMENT:

Under d. policy commitments it should be clarified that not all commitments need to be included in a document entitled "policy". The intent is that the commitment is authorized by the highest level of company management, regardless of the document name.

COMMENT:

Under e. Publicly disclose, the note should be clearer that when disclosure is limited to the reasons outlined; the facility should not be penalized and can claim to have met the requirement.

COMMENT:

Significant Concern: Overall the standard would bring additional burden in many areas and it is unlikely that this would move the needle on creating a safer, better workplace for our people which is what we always striving for. For example:

1) Section 1.2 requires companies to publicly disclose through an annual corporate-wide sustainability report in line with an internationally recognized reporting standard such as SASB or GRI. These organizations have

spent much more time and have much more experience in knowing what disclosure members of the public would like. However, the consolidated standard requires disclosure in excess of these international recognized disclosure requirements. In many cases, the additional disclosure required in the standard would not add value. Therefore, the consolidated standard shouldn't require additional reporting above and beyond these frameworks.

2) There are many sections of the consolidated standard that require processes to be created to complete an activity. In many cases, requiring a process is justified. However, not all activities require a formal process. Therefore we recommend that the committee go through the standard and only require processes when needed, otherwise just requiring that the activity be completed should be sufficient.

3) The assurance model of the consolidated standard requires an independent/external audit every three years. This is different than the MAC TSM requirement of an external verification every three years (which has a much lower threshold than audit). This change means that most of the internal/external audits that were requirements in TSM are no longer applicable in the consolidated standard, since the assurance will be an external audit. Therefore all requirements related to internal/external reviews/audits should be removed from the consolidated standard.

Performance Area 1: Corporate Requirements

SECTION: 1.1 Board and Executive Accountability, Policy and Decision, Making, Good Practice

COMMENT:

Suggest replacing "Publicly disclose" with Implement. If publicly disclosing is to remain, implementation should be good practice and publicly disclosing should be moved to leading practice.

SECTION: 1.1 Board and Executive Accountability, Policy and Decision, Making, Good Practice

COMMENT:

This standard is just one of many management standards that a company may subscribe to. It doesn't make sense to require companies to specifically reference this standard's performance areas in various processes.

COMMENT:

Suggested wording for requirement is "Demonstrate that applicable Performance Areas in this Standard have been integrated into the company's strategy". All other items that were listed would be part of (and therefore covered) by the strategy.

SECTION: 1.1 Board and Executive Accountability, Policy and Decision, Making, Leading Practice

COMMENT:

This standard is just one of many management standards that a company may subscribe to. It isn't fair to companies that are meeting all of the requirements to be penalized because they simply do not call out this specific standard in the strategy or executive compensation. This requirement should be removed completely

SECTION: 1.2 Sustainability Reporting, Good Practice, 1

COMMENT:

Please also explicitly list "Sustainability Standards Accounting Board (SASB)" as an option.

SECTION: 1.4 Risk Assessment, Foundational Practice, 1

COMMENT:

Suggested wording "Identify individual(s) who are responsible for identifying and assessing risks associated with the Facility's activities, including risks that impact local stakeholders and rights-holders, workers, and the environment."

SECTION: 1.4 Risk Assessment, Foundational Practice, 2

COMMENT:

Suggested wording "Assess and prioritize key risks managed by the Facility, including at a minimum, those identified in the applicable Performance Areas in this standard"

SECTION: 1.4 Risk Assessment, Leading Practice, 1

COMMENT:

Suggest substituting with something that better indicates leading practice for risk programs, such as the degree to which risk programs are imbedded throughout the organization, continuous improvement focus, focus on value creation, etc.

SECTION: 1.5 Crisis Management and Communications, Good Practice, 4

COMMENT:

We keep our contact list separate from the actual plan. This requirement should be removed from the sub-list and a new requirement be created to update contact details whenever there is a change in personnel.

SECTION: 1.5 Crisis Management and Communications, Leading Practice, 2

COMMENT:

Should require a review of the plan but only require an update when needed. Not all simulations result in a need to update the plan

SECTION: Intent

COMMENT:

"including tax and other relevant payments to governments, to enhance transparency and accountability of business practices." is a separate topic from accountability. Recommend deleting from section and perhaps moving instead to accountability.

Performance Area 10: Emergency Preparedness and Response

SECTION: 10.1 Emergency Preparedness and Response Planning, Good Practice, 10

COMMENT:

Meeting with senior members of the local first responder agencies should only be required "where they have responsibilities within the facility's plan" instead of "where they exist".

SECTION: 10.1 Emergency Preparedness and Response Planning, Good Practice, 2

COMMENT:

Having a requirement to “test notification mechanism that activate emergency and crisis response teams at least twice per year” doesn’t make sense. In most cases the notification system is a telephone.

Performance Area 12: Stakeholder Engagement

SECTION: 12.1 Stakeholder Identification and Engagement, Good Practice, 3

COMMENT:

Once established, the stakeholder map rarely changes. Therefore updating on an annual basis doesn’t make sense. This should be updated every three years instead.

SECTION: 12.1 Stakeholder Identification and Engagement, Good Practice, 6

COMMENT:

Should be moved to leading practice

SECTION: 12.1 Stakeholder Identification and Engagement, Good Practice, 7

COMMENT:

Should be moved to leading practice

Performance Area 14: Indigenous Peoples

SECTION: 14.1 Managing Engagement, Impacts and Opportunities with Indigenous Peoples, Good Practice, 4

COMMENT:

How is “voices” different from “knowledge” and/or “perspectives”?

SECTION: 14.1 Managing Engagement, Impacts and Opportunities with Indigenous Peoples, Good Practice, 7

COMMENT:

Requirements 6, 7 and 8 need to be merged into a single sub-section number. As wrote, if section 7 applies, by definition a facility could not meet requirements of section 6. Section 8 is critical to section 7.

SECTION: Applicability

COMMENT:

What does “where Indigenous Peoples are present” mean? Is this specific to on the facility? If surrounding the facility, if you go out far enough you will always encounter indigenous peoples. In short, need to define this better.

COMMENT:

Overall this performance indicator is much too wordy. Effort should be taken to streamline the wording and limit the number of requirement blocks.

Performance Area 15: Cultural Heritage

SECTION: 15.1 Cultural Heritage Identification and Management, Good Practice, 3

COMMENT:

Other performance indicators should not be listed as a requirement. If included as it is here, facilities would be penalized in both performance areas if not complying with reference performance area.

Performance Area 17: Grievance Management

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights, Holders, Good Practice

COMMENT:

A facility should not be penalized for not meeting the agreed timelines. There are often factors outside of the facility's control that may lead to timelines not being met.

Performance Area 18: Water Stewardship

SECTION: 18.1 Water Management and Performance, Foundational Practice, 5

COMMENT:

Clarity is required. How far downstream is expected?

SECTION: 18.1 Water Management and Performance, Good Practice, 5

COMMENT:

This requirement should be moved to leading practice. Information to complete this risk assessment may not be available without the facility conducting additional studies.

SECTION: 18.1 Water Management and Performance, Leading Practice, 4

COMMENT:

Not sure this provides value.

SECTION: 18.2 Collaborative Watershed Management, Foundational Practice, 3

COMMENT:

It is unclear what this would look like.

SECTION: 18.3 Water Reporting, Good Practice, 2

COMMENT:

“Regulatory actions” seems like a very broad term that likely captures more than what the authors intend. This should be confined to formal legal proceedings.

Performance Area 19: Biodiversity, Ecosystem Services and Nature

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Foundational Practice, 3

COMMENT:

Not sure the value in communicating this prohibition to stakeholders or rights-holders. Is this stakeholders and rights-holders of the World Heritage Sites or of the facility? What if the nearest WHS or protected area is significantly far away from the facility? Since this commitment is intended at a facility level, do individual facilities even need to make this commitment if there is no risk that they will encounter a WHS or protected area?

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Foundational Practice

COMMENT:

Significant Concern: Key Biodiversity Areas are managed by NGOs who list CPAWS, the David Suzuki Foundation, WWF, and Environment and Climate Change Canada as member organizations. Even the KBA website notes that once identified it does not automatically lead to formal protection or management requirements. Complying with these restrictions as a foundational practice is not practical or realistic.

Significant Concern: For some mining facilities it is not possible to achieve a minimum of no net loss of biodiversity, especially given that many mining facilities are already decades old.

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Good Practice, 1

COMMENT:

“Ecosystem services” should be removed. It is difficult to understand how to quantitatively assess or address material risks to ecosystem services, defined as “Any positive benefit that plants, animals or ecosystems provide to people”.

In Canada there is already the CSA risk assessment standard, which does not consider this aspect.

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Good Practice, 2

COMMENT:

Should be leading practice. For some mining facilities it is not possible to achieve a minimum of no net loss of biodiversity, especially given that many mining facilities are already decades old.

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Good Practice, 5

COMMENT:

This needs to be combined with requirement #2. If this situation exists, by definition a facility is not meeting requirement #2 and therefore would not be able to meet “good practice” as currently written.

Performance Area 2: Business Integrity

SECTION: 2.1 Legal Compliance, Foundational Practice, 1

COMMENT:

The registry of all significant legal obligations is much too broad. It should be limited to significant Safety, Health, and environment legal obligations.

COMMENT:

Significant Concern: The registry of compliance obligations is much too broad and onerous to compile. It is unlikely that any mining companies would meet these requirements as written. The registry of compliance obligations should be constrained to material Safety, Health and Environmental laws.

Performance Area 20: Climate Action

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level), Good Practice, 1

COMMENT:

It is unclear what level of detail is required for disclosure of the climate strategy.

SECTION: 20.2 Climate Change Management (Facility Level), Good Practice, 4

COMMENT:

The “surrounding areas and local affected stakeholders and rights-holders” is an additional level of effort compared to the facility focus in existing TSM Protocol and should be removed.

SECTION: 20.3 Annual Climate Change Public Reporting, Good Practice, 1

COMMENT:

The TCFD reference in this section will be very dated by the time this framework is published for implementation.

Performance Area 21: Tailings Management

SECTION: 21.1 Tailings Management, Foundational Practice

COMMENT:

It is unclear if the TSM program will be in existence once this standard is published.

SECTION: Glossary and Interpretive Guidance

COMMENT:

End of paragraph #2 - the term “relevant information” needs better definition.

COMMENT:

Paragraph #2 - "don't involve the construction of a dam". GISTM defined tailings facility to include tailings in open pit mines. To avoid confusion, the definition on Non-conventional tailings should be clarified so that disposal in open pits is not considered non-conventional... "or other tailings disposal options that don't involve the construction of a dam or disposal in open pit mines."

Performance Area 22: Pollution Prevention

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Foundational Practice

COMMENT:

This is a very broad description. How are said hazards/risks assessed? Would this require assessing an unlikely scenario where the material is released to the environment? Would having the SDS be sufficient proof that the risks have been assessed? Some of these substances are on site in extremely small quantities and a risk assessment doesn't make sense.

Simply entering the facility does not mean the substance will be stored/disposed of.

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Good Practice

COMMENT:

This requirement should be removed. Waste generation in itself does not result in an environmental release or an impact to human health/worker safety.

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Good Practice

COMMENT:

This is already captured under PA 1.2. Duplicating here has potential to double penalize companies.

SECTION: 22.2 Mineral Wastes, Foundational Practice, 1

COMMENT:

Is this even possible? Mineral waste as defined would include waste rock.

SECTION: 22.2 Mineral Wastes, Foundational Practice, 2

COMMENT:

Isn't this basically the same as #1

SECTION: 22.2 Mineral Wastes, Foundational Practice, 3

COMMENT:

Suggest combining 1, 2, and 3 all under a single requirement. They are very similar and related.

SECTION: 22.3 Non, GHG Air Emissions, Foundational Practice

COMMENT:

Most air monitoring programs are informed by the environmental assessments or regulatory requirements, not by the presence and location of sensitive receptors.

SECTION: 22.3 Non, GHG Air Emissions, Good Practice

COMMENT:

Some of our operations have very limited air emissions and it doesn't make sense to have reduction targets. Reduction targets should only be required where air emissions are resulting in impacts.

SECTION: 22.6 Accidental Polluting Releases, Foundational Practice, 1

COMMENT:

Materials is not defined. This is an extremely broad requirement and not appropriate for foundational practice. Also, some spills are very small and do not require a risk assessment.

SECTION: 22.6 Accidental Polluting Releases, Good Practice, 1

COMMENT:

This seems like same requirement as foundational #1, except to only be on material releases whereas #1 foundational seems to be on all releases. Suggest that foundational #1 is removed.

SECTION: 22.6 Accidental Polluting Releases, Good Practice, 4

COMMENT:

Requiring a post-incident review for all releases isn't practical. It should be bound to material accidental releases.

SECTION: 22.7 Noise, Vibration and Light pollution/nuisance, Foundational Practice, 1

COMMENT:

It should be clarified that if a facility does not have permit requirements to monitor noise, vibration, and light then a monitoring program is not required.

SECTION: 22.7 Noise, Vibration and Light pollution/nuisance, Foundational Practice, 2

COMMENT:

This doesn't make sense for remote operations.

SECTION: 22.7 Noise, Vibration and Light pollution/nuisance, Good Practice, 1

COMMENT:

This doesn't make sense for remote operations.

SECTION: 22.7 Noise, Vibration and Light pollution/nuisance, Leading Practice, 1

COMMENT:

I don't understand how involving these receptors will help inform/mitigate the risk?

SECTION: Applicability

COMMENT:

It is not clear which "subset of facilities" needs to implement 22.4 mercury.

SECTION: Glossary and Interpretive Guidance

COMMENT:

Sensitive receptors is utilized in multiple PA requirements. However, the definition is vague and open to interpretation.

What plant and animal species are highly sensitive to air pollution?

Performance Area 23: Circular Economy

SECTION: 23.1 Circular Economy Management at all facilities, Foundational Practice, 1

COMMENT:

Committing to apply the principles of circular economy is a very big ask and shouldn't be at the foundational level.

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Foundational Practice, 2

COMMENT:

By definition above, this should be considered good practice.

SECTION: 24.1 Closure Management, Good Practice, 10

COMMENT:

should be moved to leading practice.

SECTION: 24.1 Closure Management, Good Practice, 11

COMMENT:

should be moved to leading practice.

SECTION: 24.1 Closure Management, Good Practice, 2

COMMENT:

The intent of this requirement is unclear. Also, what is meant by "post-mining communities". Several communities are near mines, but would be relatively unaffected by a mine closure. Also, there are remote mines with no facilities near, that a mine closure would not affect the community either.

SECTION: 24.1 Closure Management, Good Practice, 4

COMMENT:

Instead of requiring "as part of the closure planning process", it should be required "as closure approaches".

SECTION: 24.1 Closure Management, Good Practice, 5

COMMENT:

should be moved to leading practice.

SECTION: 24.1 Closure Management, Good Practice, 8

COMMENT:

Should be combined with #7

SECTION: 24.1 Closure Management, Leading Practice, 2

COMMENT:

Same as above. What is meant by post mining communities? Nearby communities are not always impacted by mine closure and not all mines have communities nearby.

COMMENT:

It would be beneficial to have requirements in this PA grouped into stages of facility lifecycle (e.g. "initial closure planning", "during operations", "as final closure approaches" and "during final closure").

Performance Area 3: Responsible Supply Chains

SECTION: 3.2 Responsible Mineral Sourcing

COMMENT:

The Glossary term "minerals or metals processing" should also explicitly exclude facilities that are receiving materials for processing solely from other facilities that are under the operational control of the company.

Performance Area 4: New Projects, Expansions and Resettlement

COMMENT:

Significant Concern: The requirements around new projects/expansions goes far beyond Canadian regulatory requirements. These additional efforts would be extremely cost prohibitive and time consuming.

Performance Area 6: Child Labour and Modern Slavery

SECTION: 6.1 Risk, Mitigation and Operating Performance, Leading Practice, 1

COMMENT:

What if there are no identifiable risks as a Canadian employer.

SECTION: 6.1 Risk, Mitigation and Operating Performance, Leading Practice, 3

COMMENT:

Would there be value add in an internal audit when we are not at risk given the standards to abide to as a Canadian employer.

Performance Area 7: Rights of Workers

SECTION: 7.1 Workers' Rights Risk, Mitigation and Operational Performance, Good Practice, 6

COMMENT:

How are credible benchmarks defined?

SECTION: 7.1 Workers' Rights Risk, Mitigation and Operational Performance, Leading Practice, 7

COMMENT:

What employment agencies are being referenced here?

SECTION: 7.1 Workers' Rights Risk, Mitigation and Operational Performance

COMMENT:

There are many more requirements in this section than other equally complex sections. Suggest a review be completed to focus on the most meaningful to reduce the total number.

Performance Area 8: Diversity, Equity, and Inclusion

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Good Practice, 6

COMMENT:

Public disclosure of progress updates should be considered a leading practice.

SECTION: 8.2 Diversity, Equity, and Inclusion Management (Facility Level), Foundational Practice, 5

COMMENT:

Are "relevant" worker diversity metrics to be defined by each facility, or is there a standard set of these?

SECTION: 8.2 Diversity, Equity, and Inclusion Management (Facility Level), Good Practice, 3

COMMENT:

It should not be a requirement to provide DEI training to contractors, which is part of the definition of worker. This requirement should be bound to employees of the company

SECTION: 8.2 Diversity, Equity, and Inclusion Management (Facility Level), Good Practice, 6

COMMENT:

This requirement fits better under indicator 8.1.

SECTION: 8.2 Diversity, Equity, and Inclusion Management (Facility Level), Leading Practice, 3

COMMENT:

This should be combined with requirement #2 (under leading practice).

SECTION: 8.2 Diversity, Equity, and Inclusion Management (Facility Level), Leading Practice, 4

COMMENT:

This requirement would fit better under 8.1

SECTION: Glossary and Interpretive Guidance

COMMENT:

Diversity - Building metrics around this broad definition of diversity would be difficult. There should be universal guidance or parameters on what a "diversity metric" could be.

Performance Area 9: Safe, Healthy and Respectful Workplaces

SECTION: 9.2 Psychological Safety and Respectful Workplaces, Foundational Practice, 1

COMMENT:

More work on defining what would qualify as a psychological safety incident would be required here. Recommend moving this to good practices. #1&3 under Good Practice seems more foundational than this one? Have to educate and define before integrating reporting?

SECTION: 9.2 Psychological Safety and Respectful Workplaces, Good Practice, 5

COMMENT:

Why does the approach need to be trauma-informed? What is the value add of this specific approach as a requirement to meet Good Practice?

SECTION: 9.2 Psychological Safety and Respectful Workplaces, Good Practice, 6

COMMENT:

There is overlap with #2 above. These two requirements should be combined.

SECTION: 9.4 Monitoring, Performance and Reporting, Good Practice, 2

COMMENT:

Publicly disclosing psychological performance is difficult due to privacy issues. There should be a recognition that this is not always possible and that, when not possible, there shouldn't be impact to score

SECTION: 9.4 Monitoring, Performance and Reporting, Leading Practice, 1

COMMENT:

This discourages the setting of stretch targets and encourages facilities to set targets that are easily achievable. Having an output or result as the requirement seems inconsistent with the requirements of most other sections.

The no fatalities over 4 years I can agree with. The first part about meeting targets has limited value as the setting of the targets, in part, determines the outcome. An easy target does not drive much improvement but can be met. A more challenging target may drive more improvement without actually being met $\frac{3}{4}$ years.

Recommend removing #1 or consider altering to include that if they are not met, that potential causes and identify corrective actions be identified.

QUESTION 1

Does the scope, content, and narrative style of the consolidated standard meet your individual expectations and the collective industry expectation for responsible production practices?

Response: 2: Below expectations

Overall the standard would bring additional burden in many areas and it is unlikely that this would move the needle on creating a safer, better workplace for our people which is what we always striving for. Main areas for this additional burden are a) Additional reporting; b) Additional processes; and c) Additional reviews, internal and external. See previous note in the introductory section.

QUESTION 2

Do the requirements meet your expectations for being sufficiently clear to support consistent and practical implementation and to achieve necessary performance improvement?

Response: 2: Below expectations

For many of the requirements, it is unclear what is required for facilities. Specific examples where it is unclear are commented on in the standard. In the case of Mercury, it is confusing which facilities need to report on the entire indicator.

QUESTION 3

From your perspective, does the three-level performance structure (Foundational, Good, Leading) of the Consolidated Standard meet your expectations for providing an effective on ramp and clear articulation of good practice and effective path to continuous improvement?

Response: 3: Meets expectations

However, it is unclear what performance level a facility would report if they are not meeting the foundation level requirements.

QUESTION 1

We would value perspectives on a few additional questions related to threshold of performance associated with achievement claims. Please click here/ see page 11 of Reporting and Claims Policy.

Response: No Response

Either claims process appears satisfactory.